

Harriet M. Hageman (5-2656)
Stacia Berry (7-5001)
Hageman Law P.C.
222 East 21st Street
Cheyenne, Wyoming 82001
Telephone: (307) 635-4888
Facsimile: (307) 635-7581
hhageman@hagemanlaw.com
sberry@hagemanlaw.com
Attorneys for Accelerated Receivables Solutions

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

* * * * *

GEORGE JAMES and KELLY JAMES,)
)
Plaintiffs,)
)
vs.) Civil Action No. 13-CV-56-B
)
ACCELERATED RECEIVABLES)
SOLUTIONS, INC.,)
)
Defendant.)

ACCELERATED RECEIVABLES SOLUTIONS, INC.' MOTION
FOR EXTENSION OF TIME WITHIN WHICH TO FILE ANSWER
OR MOTION TO DISMISS COMPLAINT

Named Defendant Accelerated Receivables Solutions, Inc., (ARS) by and through its
attorneys, Hageman Law P.C., and pursuant to U.S.D.C.L.R. 6.1, hereby moves this

Honorable Court for an Order extending the time for filing an answer and/or to move to dismiss the Complaint filed in this action. ARS states as follows in support of this Motion:

1. On March 18, 2013, ARS employee Colleen Sterkel picked up ARS's mail at the Scottsbluff, Nebraska Post Office, which mail included a "Summons in Civil Action" and "Complaint" in the above-captioned matter.
2. The Summons states that ARS "must serve on the plaintiff an answer to attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure" "[w]ithin 21 days after service."
3. Twenty-one (21) days following March 18th (attempted service date) is April 9, 2013.
4. ARS is evaluating all of its available defenses, including those provided for in Fed.R.Civ.P. 12.
5. The Complaint is eighteen (18) pages long and contains 112 paragraphs. It will take some time to sort through.
6. On March 29, 2013, the undersigned attempted to make contact with the Plaintiffs (using the telephone number in the Complaint - 307-635-3119) to determine whether they would consent or object to ARS's motion for extension of time. ARS's counsel left a telephone voice-mail message for the Plaintiffs. As of the filing of this Motion neither George James nor Kelly James had responded to such call.

7. Good cause and serious circumstances exist for granting ARS's requested extension of time for filing an answer and/or moving to dismiss the complaint.
8. Pursuant to U.S.D.C.L.R. 6.1, ARS seeks a fifteen (15) day extension of the response date, up to and including April 24, 2013, in which to file an answer or to move for dismissal of the Plaintiffs' Complaint.
9. By filing this motion ARS does not waive any defenses available to it, including any defenses related to personal jurisdiction and/or defects in service.

WHEREFORE, ARS respectfully requests that the Court enter an Order extending the deadline for it to file an answer and/or move to dismiss up to and including April 24, 2013, and for such other relief as is just under the circumstances.

DATED this 2nd day of April, 2013.

/s/

Harriet M. Hageman (5-2656)
Stacia Berry (7-5001)
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Cheyenne, Wyoming 82001
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 2nd day of April, 2013, a true and correct copy of the foregoing ACCELERATED RECEIVABLES SOLUTIONS, INC.' MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE ANSWER OR MOTION TO DISMISS COMPLAINT, was served upon the following:

Kelly James 3422 Cribbon Avenue Cheyenne, Wyoming 82001 kj_james71@yahoo.com	<input checked="" type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Federal Express <input type="checkbox"/> Facsimile: _____ <input checked="" type="checkbox"/> Other: <u>Court's ECF System</u>
George James 3422 Cribbon Avenue Cheyenne, Wyoming 82001 gjames1@gmail.com	<input checked="" type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Federal Express <input type="checkbox"/> Facsimile: _____ <input checked="" type="checkbox"/> Other: <u>Court's ECF System</u>

/s/
Harriet M. Hageman